

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA.

CASE NO: 00-6309-~~CF~~-SEITZ

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

JULIUS BRUCE CHIUSANO,

Defendant.

CR
JUN 12 2001
PM 1:27
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI, FLORIDA

MOTION FOR PERMISSION TO TRAVEL

COMES NOW, the Defendant, JULIUS BRUCE CHIUSANO, by and through undersigned counsel and pursuant to the Federal Rules of Criminal Procedure, and respectfully requests this Honorable Court enter an Order permitting the Defendant to leave the State of Florida and travel to Las Vegas, Nevada, and as grounds, would show unto the Court the following;

1. That the Defendant, JULIUS BRUCE CHIUSANO, is presently released on a one hundred thousand dollar corporate surety bond with supervised release.
2. That the Defendant is also released on bond on a one hundred thousand dollar corporate surety bond in Case No. 00-6273-Cr-Huck.
3. That the Defendant has been on supervised release since October 5, 2000.
4. That the Defendant respectfully requests this Honorable Court permit the Defendant to travel to Las Vegas, Nevada, for the purpose of a weekend holiday.
5. That the Defendant desires to travel outside of the State of Florida for approximately Four (4) days beginning on or about June 14, 2001 and returning June 18, 2001.
6. That a copy of the Defendant's Itinerary is attached hereto as Defendant's Exhibit One (1).
7. That undersigned has spoken to the Pretrial Services officer, Raul Sagaro, regarding this travel permit and he has no objection.
8. That prior to the Defendant's departure the Defendant will provide addresses and telephone numbers where he will be staying to Raul Sagaro of the Pretrial Services Office in Dade

YES
RD

County, Florida, as required under Defendant's terms and conditions of supervised release and report immediately upon his return to the jurisdiction.

WHEREFORE, by reason of the foregoing, the Defendant, JULIUS BRUCE CHIUSANO, respectfully requests this Honorable Court enter an Order granting the Defendant's request permitting the Defendant to travel outside the State of Florida to Las Vegas, Nevada.

10-G CERTIFICATE

That undersigned counsel, pursuant to Local Rule 10(G)(1) certifies that he has contacted the opposing counsel, Assistant United States Attorney, Brian McCormick, of the Southern District of Florida in an effort of good faith to resolve by agreement the subject matter and he states that he has no objection to the granting of this motion.

I HEREBY CERTIFY that a copy of the foregoing has been furnished to Brian McCormick, Assistant United States Attorney, United States Attorney's Office, 299 East Broward Boulevard, Fort Lauderdale, FL 33301, by Facsimile (954-356-7230) and Raul Sagaro, Pretrial Services, 330 Biscayne Blvd., Suite 500, Miami, FL 33132, by Facsimile 305-530-7123, and by U.S. Mail, and the original hereof filed with the Clerk of the Court, by Hand Delivery, this
6th JUNE, 2001.

Respectfully submitted,

DONALD R. SPADARO, P.A.
Attorneys for DEFENDANT/CHIUSANO
1000 South Federal Highway
Suite 103
Fort Lauderdale, Florida 33316
Telephone: (954) 763-5504

By:


DONALD R. SPADARO, ESQUIRE
Florida Bar No.: 320341

SALES PERSON: AM

ITINERARY

RIDLEE

DATE: 05 JUN 01
PAGE: 01

TO: LIBERTY TRAVEL
 18797 BISCAYNE BLVD
 AVENTURA FL 33180

FOR: CHIUSANO/BRUCE

14 JUN 01 - THURSDAY

| | | | | |
|-----|--------------------|----------|-------------|-----------------|
| AIR | NATIONAL AIRLINES | PLT: 80 | FIRST CLASS | BREAKFAST |
| | LV MIAMI INTERNTNL | | 820A | EQP: BOEING 757 |
| | AR LAS VEGAS | | 1030A | 05HR 10MIN |
| | CHIUSANO/BRUCE | SEAT- 2A | | NON-STOP |
| | | | | REF: GASBBO |

18 JUN 01 - MONDAY

| | | | | |
|-----|--------------------|----------|-------------|-----------------|
| AIR | NATIONAL AIRLINES | FLT: 973 | FIRST CLASS | LUNCH |
| | LV LAS VEGAS | | 1250P | EQP: BOEING 757 |
| | AR MIAMI INTERNTNL | | 830P | 04HR 40MIN |
| | CHIUSANO/BRUCE | SEAT- 4A | | NON-STOP |
| | | | | REF: GASBBO |

 * ALL PASSENGERS 16 YEARS OF AGE AND OLDER MUST
 * TRAVEL UNDER FULL LEGAL NAMES WITH A GOVT
 * ISSUED PHOTO ID IN THAT NAME
 * ALL PASSENGERS TRAVELING OUTSIDE THE 50 UNITED STATES
 * ARE REQUIRED TO CARRY A VALID PASSPORT AND/OR VISA
 * PLEASE CHECK WITH YOUR TRAVEL CONSULTANT

 * ALL FLIGHT TIMES MUST BE CONFIRMED WITH THE AIRLINES
 * AT LEAST 48 HOURS PRIOR TO DEPARTURE
 * CHECK IN FOR ALL AIRLINES IS A MINIMUM OF 90
 * MINUTES PRIOR TO DEPARTURE TIME

 * LIBERTY TRAVEL IS HERE TO SERVICE YOU BEFORE,
 * DURING AND AFTER YOUR TRIP. PLEASE DO NOT HESITATE
 * TO CALL YOUR TRAVEL CONSULTANT.